## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Nicole N. Marzio		
1, 122, 1,1000 1, 1,141210	Debtor(s)	CHAPTER 13
	,	
MTGLQ Investors, L.P.		
	Movant	
VS.		NO 10 11510 IVE
Nicole N. Marzio		NO. 19-11310 JKF
THEORE IV. WHILEIO	Debtor(s)	
	· /	
Scott F. Waterman		
	Trustee	11 U.S.C. Section 362
vs. Nicole N. Marzio	Movant  Debtor(s)  Trustee	NO. 19-11510 JKF 11 U.S.C. Section 362

## MOTION OF MTGLQ Investors, L.P. TO APPROVE LOAN MODIFICATION

- 1. The Movant is MTGLQ Investors, L.P.
- 2. Debtor(s) is/are the owner(s) of the premises 522 Arbor Road, Lansdown, PA 19050, hereinafter referred to as the mortgaged premises.
- 3. Movant is the holder of a mortgage, original principal amount of \$108,000.00 on the mortgaged premises that was executed on September 12, 2007. Said mortgage was recorded on September 27, 2007 at Book 4210, Page 1766. The Mortgage was subsequently assigned to Movant by way of Assignment of Mortgage recorded on April 1, 2019, at Book 06301, Page 0030 in Delaware County.
  - 4. Scott F. Waterman, is the Trustee appointed by the Court.
- 5. Debtor has applied and been approved for a Loan Modification Agreement with Movant.

  The Loan Modification is attached hereto as Exhibit "A".
  - 6. Movant seeks Court approval of the Loan Modification by way of the within Motion.
- 7. Approval and recordation (if applicable) of the Loan Modification shall not constitute a violation of the automatic stay.
- 8. Upon Court approval of the within Motion, Movant shall file an Amended Proof of Claim to reflect the Loan Modification within thirty (30) days of the entry of any such Order.

Case 19-11510-amc Doc 35 Filed 04/17/20 Entered 04/17/20 16:57:23 Desc Main Document Page 2 of 2

WHEREFORE, Movant prays that an Order be entered approving the Loan Modification Agreement and allowing for the recordation of such agreement (if applicable).

/s/ Rebecca A. Solarz, Esquire

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